

TOWN OF COOPER/WASHINGTON COUNTY FIBER INITIATIVE

March 7, 2014

**Letter – Expression of Interest
VIA ECFS**

Chairman Thomas Wheeler
Commissioner Mignon Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
Commissioner Michael O’Rielly
Jonathan Chambers
Federal Communications Commission
445 12th Street, SW 20024
Washington, DC

**Re: Expression of Interest – Rural Broadband Experiments
Connect America Fund, WC Docket No. 10-90**

Dear Chairman Wheeler, Commissioners, and Mr. Chambers,

This letter is to express our interest in participating in the Rural Broadband Experiments announced at the January 30th FCC Open Meeting. We have a very specific project to propose and would like to take this opportunity to document the need for high-speed Internet service in our area. We respectfully ask the Federal Communication Commission to consider this need when making decisions regarding the Rural Broadband Trials and any future initiatives related to the Connect America Fund.

First Things First: The Broadband Maps Are Wrong

The national and Maine broadband maps and databases incorrectly identify multiple providers that supposedly provide high speed Internet in our area, and particularly to our target municipality, the Town of Cooper. It must be absolutely understood that these providers *do not provide Internet access to Cooper*. This erroneous data has kept us from being able to leverage grant funds. For five years our town and our umbrella organization, Washington County Fiber Initiative, has tried to work with entities including internet service providers (ISPs), ConnectME, USDA, broadband councils, and many others—not least among them, numerous government officials from the local level right up to the United States Senate—only to be thwarted at every turn as a result of these erroneous maps. To be specific, the map data for Cooper indicates that the town is blanketed with high-speed access options from technology companies Axiom Technologies, Fairpoint, Pioneer Wireless, AT&T, and US Cellular. That is not the case. Additionally Cooper is listed on various grants as having been supplied Broadband several times over. Again, this is absolutely not the case. Cooper’s sole option for broadband is Pioneer Wireless, a small local firm. Pioneer offers maximum nominal speeds of less than 1 MB down and 250 KB up. Real speeds are a fraction of these limits, and because of our severe geographical limitations, *only twelve homes can connect*. Furthermore, it is the stated intention of

TOWN OF COOPER/WASHINGTON COUNTY FIBER INITIATIVE

Pioneer's executives to terminate all its wireless service sometime in the next few years. The other providers listed as available to us in the official maps and databases are unable to extend coverage to Cooper homes or its municipal building, including its community center and fire station, by wireless or by any technology better than dial-up. Our use of effective satellite connections is also limited because of heavy forest growth, the low satellite horizon in our northern location, and extremely high cost.

Background

Demographics The Town of Cooper, Maine, County of Washington, has a year-round population of approximately 145 people dwelling in 65 homes distributed over 32.57 square miles. An additional 200+ summer residents contribute to our economy June through September. However, our project seeks to utilize the Town of Cooper as the focus of a plan that could ultimately enable connectivity for a dozen neighboring communities, all of which are also desperately in need of high speed Internet. Although these communities are likewise rural in character, their inclusion in our plan will greatly increase the impact of the project. We compute that the larger target area includes 1000+ homes and businesses.

Topography Cooper is located in Downeast Maine, ninety miles northeast of Bangor, close to the Canadian border. The severe geographical challenges to wireless transmission include Cooper Mountain and similar, irregularly located hills as well as ridges of glacial moraine, to say nothing of heavy forestation that generally extends from the crests of the hills to the waterline of the Town's major lake and other bodies of water. These geographic challenges are typical of the inland Downeast Maine region and, as noted, preclude effective fixed wireless transmission.

Economic Factors Washington County has had a natural-resource-based economy since its initial settlement by Native American and then European peoples. The poverty in Washington County is the worst in the state and among the worst in the nation. Population has remained low because of constant outmigration. However, it is our intention to make our part of Washington County into a showcase to prove how FTTH can transform poverty into prosperity, and our area possesses some **strong pluses** that we hope to leverage into an economic boom. These pluses include two excellent educational centers, the University of Maine at Machias and a regional technical center in Calais. There are as well two excellent hospitals, the Calais Regional Hospital and the Downeast Community Hospital, and several high-powered local care providers, including the Regional Medical Centers in Eastport and Lubec. We have a superb deepwater harbor at Eastport that currently handles international shipping. Woodland Pulp, LLC, the county's largest employer, is only thirty miles from Cooper. Woodland Pulp is presently planning to build two new tissue machines, an expansion that would add between 80 and 100 employees to its thriving workforce of 350. Another vital resource is the scattered but dynamic component of highly educated professionals that have chosen to live in this area because of its natural beauty. But most important of all: as recently documented in a University of Maine study, there are over 5,000 micro-businesses operating within the borders of Washington County—mostly home-based businesses that employ 1–4 workers. In a web-based world, all of these businesses will require true high-speed fiber-based Internet in order to grow.

Our Vision

Our bold plan calls for installing FTTH (Fiber-to-the-Home) in every home and business in Cooper. We plan to accomplish this by connecting to the Internet backbone via the Three Ring Binder middle mile fiber ring. (Three Ring Binder, a superb but still underutilized fiber infrastructure, was recently completed through a BTOP grant.) We believe that FTTH will cause a boom in **web-based sales businesses** in our area, not only those that deal in local products (whether agricultural, such as blueberry and cranberry products; or value-added forest and farm products, such as cheese and wool), but also those that trade in goods drop-shipped directly from supplier to consumer without ever entering Maine. We also envision the local tech school training our youth in the industries of the future, such as **web design, video production, graphic arts, content development—all trades that can be carried on remotely**, given the existence of high-speed symmetrical fiber connections. Local students have already shown tremendous prowess in these fields, winning numerous awards and landing high-paying jobs on the cutting edge of the tech industry. With the existence of FTTH throughout our part of Washington County, these award-winning go-getters will have a reason to stay here. And our area—with its unique combination of excellent connectivity, beautiful seashores, lakesides, forests, and mountains—**will attract all manner of live-anywhere, educated professionals**. To give one timely example, FTTH in Cooper and our larger target area will help attract the much-sought-after and highly skilled workers for the new expansion at Woodland Pulp, LLC.

Furthermore, there will be immediate benefits to the local economy in a **longer tourist season**. Visitors who have had to limit their stay at vacation camps and cottages will be able to work “from camp” and prolong their time in the county, bringing more dollars to existing service industries. We have documented interest from many summer visitors who would gladly extend their summers into fall in they could only stay connected with their work and the world at large. And **real estate values**—still at the bottom of the post-recession crash—will increase as people “from away” find that our offering of a beautiful location and powerful connectivity makes an irresistible option for first and second homes. **Our local students will be able both to learn from home** and to participate in the booming business and culture that the Internet has brought to the world. We will also be able to provide **connection to our excellent medical centers for homebound elderly**, who will be spared many of the costs and hazards of travel to and from these facilities.

Finally, it is our hope that the success of this experiment in Cooper and Washington County will **serve as an active example and a beacon** lighting the way to the new American future. We believe that this beacon will educate our political leaders in the power and the necessity of FTTH, and will inspire them to replicate this model across the State of Maine.

Location of the Proposed Project

The Town of Cooper is located in Census Block 9559. However, by extending fiber from the Three Ring Binder middle mile to Cooper, “last mile” connections throughout Census Blocks 9551, 9553 and 9556 will also become possible. **All of these Census Blocks are FCC targeted blocks** for this experiment. They are all very underserved—in many districts completely without any high-speed access at all. Since the Town of Cooper lies just within the circumference of the Three Ring Binder middle mile fiber previously mentioned, we are ideally situated to connect to this middle mile fiber at multiple points.

Proposed technology

We believe in FTTH. Fiber-to-the-Home is the only future-proof technology. Networks of combined fiber, DSL, and cable are being outmoded across America before they can even be completed. We intend to cut to the chase, complete the “last mile,” and provide true and complete fiber connection to the Internet for all our homes and businesses. As indicated, when we bring fiber from the Three Ring Binder to Cooper, we will enable connections to the other FCC-approved Census Blocks off that fiber trunk. The finished complex would total approximately 110 miles of fiber.

Providers

Existing Providers As indicated, Pioneer Wireless currently has 12 customers with maximum download speeds of less than 1MB and upload speeds of less than 250 KB. Again, please be aware that all Broadband maps purporting to indicate the existence of other providers in our area are utterly erroneous.

Provider Interest Several internet service providers have expressed their willingness to work with us on this project.

An Additional Benefit Because Cooper Mountain, centrally located in Cooper, has a communications tower already in place, we are also investigating a possible partnership with any of several cell providers. This tower presently hosts antennas for the US Coast Guard and US Moosehorn Wildlife Refuge as well. A fiber link between the Three Ring Binder middle mile, and our target area would enable a backhaul connection to the Cooper Mountain tower. Such a link would make possible complete cell service in area where coverage is currently only intermittent. It would also greatly enhance communications for the US Coast Guard and US Moosehorn Wildlife Refuge.

Local Government Participation

The Town of Cooper is the governmental participant on this project. Several of the towns in the listed Census Blocks are unorganized; i.e., have no municipal government. Our own grass-roots organization, the Washington County Fiber Initiative, has polled residents of other towns in the listed Census Blocks and verified the existence of a desperate need and strong interest there.

TOWN OF COOPER/WASHINGTON COUNTY FIBER INITIATIVE

List of Anchor Institutions

In the Town of Cooper:

Cooper Community Center (including the Town of Cooper municipal offices)
Cooper Volunteer Fire Department

In other towns and townships in the listed Census Blocks:

Schools: Edmunds School, Alexander Elementary School, Wesley School, Charlotte School

Municipal offices: Meddybemps, Alexander, Charlotte, Crawford, Alexander, Northfield, Marshfield

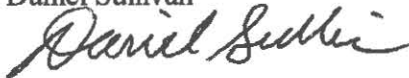
Fire Stations: Alexander & Charlotte

Community Center: Meddybemps Community Center.

For us here in Cooper and at the Washington County Fiber Initiative, the FCC Rural Broadband Experiments are a dream come true. As described above, we have been working to bring high-speed fiber to our area for the past five years. We will continue our labors until we make this happen. We hope you can see our dream and share it with us. Our area could **prove what high-speed access to the Worldwide Web can do** by allowing one of the poorest counties in our nation to bootstrap its way to prosperity.

Sincerely,

Daniel Sullivan



Broadband Representative, Town of Cooper
Director, Washington County Fiber Initiative
Cooper, Maine
(207) 214-4516